

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

AIG SPECIALTY INSURANCE COMPANY (F/K/A CHARTIS SPECIALTY INSURANCE COMPANY)	* * * * * * * * *	CIVIL ACTION NO. 6:21-cv-04191 JUDGE ROBERT R. SUMMERHAYS MAGISTRATE JUDGE CAROL B. WHITEHURST
VERSUS		
KNIGHT OIL TOOLS, INC.		

**MOTION FOR LEAVE TO FILE REPLY MEMORANDUM IN SUPPORT OF
KNIGHT’S MOTION TO DISMISS OR, IN THE ALTERNATIVE,
TO STAY PROCEEDINGS**

NOW INTO COURT, through undersigned counsel, comes Defendant, Knight Energy Services, LLC (“Knight”), incorrectly identified as Knight Oil Tools, Inc., who requests leave of this Honorable Court to file into the record the attached Reply Memorandum in Support of Knight’s Motion to Dismiss or, alternatively, Stay Proceedings (“Reply Memorandum”). Knight respectfully submits that leave should be granted so that Knight has an opportunity to address the allegations raised in the Joint Memorandum in Opposition filed by Plaintiff, AIG Specialty Insurance Group (“AIG”) [R. Doc. 63], which was filed in response to Knight’s Motion to Dismiss or, alternatively, Stay Proceedings [R. Doc. 42].

Knight believes that the attached Reply Memorandum will be of assistance to the Court in considering the issues and arguments raised by the parties, and that it will not prejudice AIG. In accordance with Local Rule 7.6, undersigned counsel certifies that she has contacted counsel for AIG, ACE American Insurance Company, and Rippy Oil Company, and that no party has an opposition to the filing of this reply.

WHEREFORE, for the foregoing reasons, Defendant, Knight prays that its Motion be deemed sufficient; that the Court grant Knight leave to file the attached reply brief into the record; and for all other relief provided by law and appropriate under the circumstances.

Respectfully submitted by:

s/Vanessa W. Anseman

Vanessa W. Anseman (Bar No. 28795)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 30th day of August, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel registered for electronic service. I further certify that I have served a copy of the foregoing pleading on all parties to this proceeding not registered for electronic service, by e-mailing, faxing, and/or mailing the same by United States mail, properly addressed and first-class postage prepaid.

/s/ Vanessa W. Anseman

Vanessa W. Anseman